

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Robert Manchel, Esquire
1 Eves Drive, Suite 111
Marlton, NJ 08053-3125
Attorney for Debtor
RM-1141

In Re:

Shaun J. Reiss

Case No. 18-25819MBK

Judge: Michael B. Kaplan

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(**choose one**):

1. X Motion for Relief from the Automatic Stay filed by PNC Bank, NA,
creditor. A hearing has been scheduled for March 12, 2019, at 9:00 a.m.

OR

 Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has
been scheduled for at a.m.

OR

 Certification of Default filed by , creditor. I am requesting that a
hearing be scheduled on this matter.

OR

 Certification of Default filed by Standing Chapter 13 Trustee.
I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: I made a payment of \$2,623 on February 27, 2019. I would like to resume regular mortgage payments as of March 2019 and cure the arrears over six (6) months beginning April 2019. I respectfully request the court deny the movant's motion and allow me to continue and complete my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 3/1/2019

/s/ Shaun J. Reiss
Shaun J. Reiss, Debtor